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**Via Overnight Mail**

May 3, 2006

Beth A. O'Donnell, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

**RECEIVED**

**MAY 04 2006**

**PUBLIC SERVICE  
COMMISSION**

**Re: Case No. 2006-00128**

Dear Ms. O'Donnell:

Please find enclosed the original and twelve (12) copies of the Petition to Intervene of Kentucky Industrial Utility Customers, Inc. in the above-referenced matter. By copy of this letter, all parties listed on the Certificate of Service have been served.

Please place this document of file.

Very Truly Yours,



David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**

MLKkew  
Attachment  
cc: Certificate of Service

**CERTIFICATE OF SERVICE**

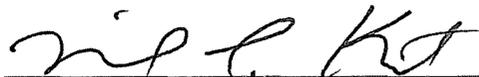
I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by first-class postage prepaid mail, to all parties on the 3<sup>rd</sup> day of May, 2006.

Timothy C. Mosher  
American Electric Power  
101A Enterprise Drive  
P. O. Box 5190  
Frankfort, KY 40602

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Assistant Attorney General  
Office of the Attorney General  
Utility & Rate Intervention Division  
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David F. Boehm, Esq.  
Michael L. Kurtz, Esq.

RECEIVED

MAY 04 2006

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of: Examination By The Public Service : Case No. 2006-00128  
Of The Environmental Surcharge Mechanism Of Kentucky Power :  
Company For The Six-Month Billing Periods Ending December 31, 2002 :  
December 31, 2003, June 30, 2004, December 31, 2004 and December :  
31, 2005 And For The Two Year Billing Periods Ending June 30, 2003 and :  
June 30, 2005 :

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PETITION TO INTERVENE OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

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Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), Kentucky Industrial Utility Customers, Inc. ("KIUC") requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

1. KIUC is an association of the largest electric and gas public utility customers in Kentucky. The purpose of KIUC is to represent the industrial viewpoint on energy and utility issues before this Commission and before all other appropriate governmental bodies. The members of KIUC who will participate herein are: AK Steel Corporation, Air Products & Chemicals, Inc., Marathon Ashland Petroleum LLC and Special Metals. KIUC will supplement the names of additional intervenors when necessary.

2. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC for electricity. Electricity represents a significant cost of doing business for KIUC. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**  
36 East Seventh Street, Suite 1510  
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E-Mail: [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)  
[dboehm@bkllawfirm.com](mailto:dboehm@bkllawfirm.com)

3. The position of KIUC cannot be adequately represented by any existing party. KIUC intends to play a constructive role in the Commission's decision-making process herein and KIUC's participation will not unduly prejudice any party.

**WHEREFORE**, KIUC requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,



David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202

**COUNSEL FOR KENTUCKY INDUSTRIAL  
UTILITY CUSTOMERS, INC.**

May 3, 2006